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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

JOHN GILBERT,)	
)	
Plaintiff,)	
)	
vs.)	
)	
APC NATCHIQ, INC.)	
)	
Defendant.)	
_____)	Case No. 3:03-CV-00174 RRB

PLAINTIFF'S MOTION FOR ORDER FOR 90-DAY PENALTY

COMES NOW Plaintiff, John Gilbert, by and through its undersigned counsel, The Law Office of Kenneth L. Covell and moves the Court for an Order directing the defendant to pay a 90-day penalty for its failure to pay all overtime and wages due him, pursuant to AS 23.05.140(d).

This motion is further supported by the attendant Memorandum of Law and Exhibits.

Respectfully submitted this 4th day of August, 2006 at Fairbanks, Alaska.

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been
Electronically sent to the following attorney(s):

Patricia Zobel
DeLisio Moran Geraghty & Zobel
943 W. 6th Ave.
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Dated: 8/04/06

By: /s/ Emily S. Ervin
Emily S. Ervin for Kenneth L. Covell